

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

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| <b>IN RE: ETHICON, INC., PELVIC<br/>REPAIR SYSTEM PRODUCTS<br/>LIABILITY LITIGATION</b> | <b>Master File No. 2:12-MD-02327<br/>MDL 2327</b> |
| <b>THIS DOCUMENT RELATES TO ALL<br/>CASES</b>   | <b>JOSEPH R. GOODWIN<br/>U.S. DISTRICT JUDGE</b>  |

**CROSS NOTICE OF DEPOSITION OF GARY PRUDEN**

**TO: ALL COUNSEL OF RECORD**

**PLEASE TAKE NOTICE** that the deposition of GARY PRUDEN will be taken jointly in connection with *In Re Pelvic Mesh/Gynecare Litigation*, Superior Court of New Jersey Law Division, Atlantic County, Case No. 291 CT, Master Case 6341-10, upon oral examination on September 11, 2012, at 7:30 a.m. EST, at Drinker Biddle & Reath, 105 College Road East, Princeton, New Jersey, 08542-0627.

**PLEASE TAKE FURTHER NOTICE** that in accordance with Rule 30 of the Federal Rules of Civil Procedure, the procedures set forth *In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327, and Rule 4:14 of the New Jersey Rules of Court, Defendants Ethicon Inc. and Johnson & Johnson hereby cross-notice this deposition for any and all purposes permitted by the Federal Rules of Civil Procedure, the rules of the MDL Court, and any other state or local rules that apply to this action. Defendants Ethicon, Inc. and Johnson & Johnson further state that this deposition shall be conducted in accordance with and subject to the Protective Orders entered in *In Re Pelvic Mesh/Gynecare Litigation*, Superior

Court of New Jersey Law Division, Atlantic County, Case No. 291 CT, Master Case 6341-10  
and in *In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327.

This deposition will be taken before a person authorized by law to administer  
oaths.

Dated: September 5, 2012.

Respectfully submitted,

/s/Christy D. Jones  
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COUNSEL FOR DEFENDANTS  
ETHICON, INC. AND  
JOHNSON & JOHNSON

**CERTIFICATE OF SERVICE**

I hereby certify that on September 5, 2012, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to CM/ECF participants registered to receive service in this MDL.

/Christy D. Jones  
Christy D. Jones

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